

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA : CRIMINAL NO. 5:22-CR-00049 (GWC)  
:   
v. :   
:   
NATHAN CARMAN : MARCH 21, 2023

**DEFENDANT NATHAN CARMAN'S  
MOTION FOR DISCLOSURE OF *GIGLIO* MATERIAL**

Defendant, Nathan Carman, respectfully moves this Court for an order requiring the Government to produce information that impeaches the credibility of the Government's witnesses pursuant to *Giglio v. United States*, 405 U.S. 150 (1972) and D. Vt. Local R. Crim. P. 16(d)(1). The disclosure of impeachment material, earlier than fourteen (14) days prior to the start of jury selection, is necessary to ensure Mr. Carman receives a fair trial. Accordingly, the Court should grant Mr. Carman's motion.

In accordance with D. Vt. Local R. Crim. P. 16(f), counsel for Mr. Carman and the Government met and conferred telephonically regarding the requested disclosure on March 20, 2023, at approximately 4:00 p.m. Counsel on the meet and confer call on behalf of Mr. Carman was Attorney David X. Sullivan, and counsel for the Government were Assistant U.S. Attorneys Paul J. van de Graaf and Nathanael T. Burris. Counsel for both parties agreed to work pursuant to this motion and informally to ensure the disclosure of all *Giglio* material sooner than the 14-day timeframe referenced in Local Rule 16(d)(1).

WHEREFORE, for the reasons set forth herein and in the accompanying memorandum of law, Defendant, Nathan Carman, respectfully requests that the Court grant his Motion for Disclosure of *Giglio* Material.

Dated: March 21, 2023  
Hartford, Connecticut

Respectfully submitted,

DEFENDANT  
NATHAN CARMAN

By: /s/ David X. Sullivan

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**CERTIFICATION**

I hereby certify that on this date a copy of the foregoing motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ David X. Sullivan  
David X. Sullivan (*Pro Hac Vice*)